III. REMARKS

Claims 1-20 remain pending, and are rejected under 35 USC 103(a) as allegedly being unpatentable over Morioka et al., (US Patent 6,611,728) "Morioka" in view of Gillenwater et al. (US Patent 6,557,115) "Gillenwater." Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

Applicant has herein amended claims 1, 5, 9, 15 and 18. Applicant respectfully submits that entry of this Amendment is proper under 37 C.F.R. § 1.116(b) because this Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. In particular, Applicant has herein clarified the concept of "simulation" to make it clear that the simulation is a simulation program that, e.g., programmatically simulates operation of the electronic device in a virtual environment. Applicant submits that although new language is introduced, the concept was previously presented, e.g., in claim 8. Accordingly, Applicants respectfully request entry of this Amendment.

Applicant respectfully submits that all claims are allowable over the cited art. "To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art

reference (or references when combined) must teach or suggest all the claim limitations." MPEP 706.02(j).

The final Office Action states that Morioka et al. clearly teaches the limitation of simulating the operation of the device. Applicant herein contends that Morioka does not teach a simulation program *that programmatically simulates operation of the electronic device in a virtual environment*, but rather teaches testing the actual devices themselves. Simulation in the context of the presently claimed invention does not analyze a physical device, but instead programmatically simulates operation of the device to identify suspected faulty device features.

Instead, Morioka teaches an inspection system that utilizes real (not simulated) inspections to map defects, and Gillenwater teaches a system for rearranging testing sequences based on prior real (not simulated) testing results. Neither reference teaches or suggests using a *simulation program* to simulate the operation of a device.

Furthermore, neither reference teaches a simulation program that utilizes device logic and operational logs to identify faulty device features, such as that recited in claim 5. Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

/ Michael Hoffman /

Michael F. Hoffman
Reg. No. 40,019

Dated: 7/9/07

Hoffman, Warnick & D'Alessandro LLC
75 State Street
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile